

**3 RIVERS PCS, INC. d/b/a
3 RIVERS WIRELESS
P.O. BOX 3387
GREAT FALLS, MONTANA 59403-3387**

Marlene Dortch, Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

**Re: CC Docket No. 94-102
Broadband PCS Station WPOI209
Seventh Quarterly Report**

Dear Ms. Dortch:

This report is filed pursuant to the Commission's *Fourth Report and Order*, in CC Docket No. 94-102, released December 14, 2000.

3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless (3 Rivers) is the licensee of station WPOI209 in the Broadband Personal Communications Service (PCS). Station WPOI209 is a license partitioned from the 30 MHz Block A license granted to GTE Macro Communications Corporation (GTE), on June 23, 1995, for the Spokane-Billings Major Trading Area (MTA). On April 17, 1997, the Commission approved the application to partition to 3 Rivers a portion of GTE's license for the Spokane-Billings MTA, to include the Great Falls, Billings, Bozeman, Helena and Butte (except for Powell County) Basic Trading Areas. 3 Rivers utilizes Nortel Networks' CDMA equipment for its PCS network.

In our *Sixth Quarterly Report*, filed July 15, 2002, we noted our progress as of June 30, 2002 toward achieving compliance with Section 20.18(c) of the Commission's Rules, including our filing with the Commission on June 28, 2002, in which we formally requested a waiver of Rule Section 20.18(c), insofar as it concerned the June 30, 2002 compliance deadline. There, we described the problems we were having in achieving timely compliance, including the inability to upgrade our existing Nortel Networks switch due to its discontinuance and the delays in obtaining even a price quote from Nortel for the new switch that will be required to achieve TTY compatibility. The waiver request was supported by a letter from Nortel in this regard and described our progress as of the end of June 2002.

Then, in August, we received a proposal from Nortel for the new switch that will be needed to support our wireless operations. As we have previously advised the Commission, Nortel will no longer support our dual-platform switch that is only four years old, thereby requiring that we purchase and house a new switch in order to achieve compliance with several Commission mandates for CMRS carriers, including TTY access.

We are now in the process of engaging in due diligence in connection with Nortel's proposal, including negotiating the final price, deliver and installation terms. We do not anticipate that this process will be completed until year's end or possibly the first quarter of 2003.

We recently received for evaluation a new handset from Kyocera that is supposed to be TTY compatible, but is not yet commercially available. However, we will not be able to do any compatibility testing on our system until the new Nortel switch is installed and ready for operation.

Respectfully submitted,

**3 Rivers PCS, Inc. d/b/a
3 Rivers Wireless**

By: /s/ Ernest J. Peterson
Ernest J. Peterson, General Manager

Dated: October 15, 2002

Of Counsel:

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